## IN THE UNITED STATES DISTRICT COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

UNITED STATES OF AMERICA,	)
Plaintiff,	) ) Filed 9-26-96
V.	) Civil Action No ) 96CV-6515
IXTLERA DE SANTA CATARINA, S.A. DE C.V.; and MFC CORPORATION,	)
Defendants.	) )

## STIPULATION

It is stipulated by and between the undersigned parties, by their respective attorneys, that:

- (1) The parties consent that a final judgment in the form hereto attached may be filed and entered by the Court at any time after the expiration of the sixty (60) day period for public comment provided by the Antitrust Procedures and Penalties Act, 15 U.S.C. § 16(b)-(h), without further notice to any party or other proceedings, either upon the motion of any party or upon the Court's own motion, provided that plaintiff has not withdrawn its consent as provided herein;
- (2) The plaintiff may withdraw its consent hereto at any time within said period of sixty (60) days by serving notice thereof upon the other party hereto and filing said notice with the Court;
- (3) In the event the plaintiff withdraws its consent hereto, this stipulation shall be of no effect whatever in this

or any other proceeding and the making of this stipulation shall not in any manner prejudice any consenting party to any subsequent proceedings.

Dated:

Respectfully submitted,

For the Plaintiff:

/s/

/s/

JOEL I. KLEIN Acting Assistant Attorney General

/s/

/s/

REBECCA P. DICK Deputy Director of Operations MICHELLE A. PIONKOWSKI

/s/

/s/

ROBERT E. CONNOLLY

ROGER L. CURRIER

EDWARD S. PANEK

/s/

JOSEPH MUOIO

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Chief, Middle Atlantic Office

For the Defendants:

/s/

IXTLERA DE SANTA CATARINA, S.A. DE C.V.

/s/

MFC CORPORATION